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DuPont Haskell Laboratory
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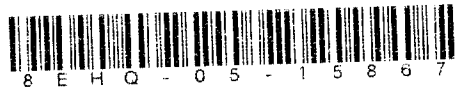
December 10, 2004

Via Federal Express



Document Processing Center (Mail Code 7407M)
Room 6428
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Ave., NW
Washington, DC 20460

Dear 8(e) Coordinator:

1,3-Di-ortho-tolylguanidine (DOTG)
CAS # 97-39-2

This letter is to inform you of some preliminary blood biomonitoring information that was recently brought to our attention by a third party, relative to the chemical substance referenced above.

DOTG is used as an accelerator in the curing of certain types of rubber. DOTG contains low levels of o-toluidine (CAS # 95-53-4) below 1000 ppm from the manufacturing process but o-toluidine apparently is also a volatile decomposition product when rubber compounds with DOTG are exposed to heat, e.g. vulcanization or post-curing. We have been notified about an ongoing study sponsored by the "Berufsgenossenschaft" (BG) in Germany. The lead investigators are Prof. Weiss and Angerer at the University of Erlangen. The preliminary information we received through the third party indicates concentrations of o-toluidine in blood of individual European workers as high as 1900 ng/l with an average of 600 ng/l of all measurements. We have been informed that the study investigators find the substance is present in the blood of the general population at levels below 54 ng/l. The concentration of o-toluidine in air at the investigated workplaces was reported to be below exposure limits. Additional information on the study is best obtained via direct contact with the study investigators.

DuPont does not manufacture, import or process DOTG, but the substance is used by some of our customers.

Sincerely,

A. Michael Kaplan

A. Michael Kaplan, Ph.D.
Director – Regulatory Affairs and Occupational Health

AMK:clp
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